



Roy F. Weston, Inc.
Federal Programs Division
217 Middlesex Turnpike
Burlington, Massachusetts 01803-3308
781-229-6430 • Fax 781-272-3619



SEMS DocID

594277

SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM
EPA CONTRACT 68-W5-0009

10 February 1999
11098-031-001-5854
DC No. R-1782

Mr. John M. Carlson
Response Project Officer
U.S. Environmental Protection Agency
Region I HBS
John F. Kennedy Federal Building
Boston, MA 02203-0001

Subject: TDD No. 98-12-0011
Site Management Audit
Field Safety Inspection

Dear Mr. Carlson:

On Wednesday, 3 February 1999, a joint Region I Superfund Technical Assessment and Response Team (START) Site Management Audit and Field Safety Inspection was conducted by START Health & Safety Officer (HSO) Paul Callahan at the American Glue & Resin site (the site) located in Middleton, Essex County, Massachusetts. Robert Hinten, U.S. Environmental Protection Agency (EPA) HSO, and Kevin McMahon, Emergency and Rapid Response Services (ERRS) HSO, also conducted site safety audits/inspections on this date. The lead START member assigned to the site is Stephen Amirault. The EPA On-Scene Coordinator (OSC) for the site is Gilberto Irizarry.

The site is the former location of the American Glue & Resin Company, a manufacturer of adhesives and glues from the 1970's to the 1990's. It consists of 3.2 acres, and is comprised of one single-story concrete block building of approximately 100,000 square feet, one single-story shed, a paved parking area, and wetlands associated with the adjacent Boston Brook.

In September 1998, EPA and Massachusetts Department of Environmental Protection representatives conducted an inspection of the property. Approximately 500 labeled and unlabeled drums and containers were observed in the building, some of which appeared to be leaking or in poor condition. Label information from inventories supplied by the property owner have identified drum contents that include glues, resins, solvents, flammable liquids and acids. This information prompted EPA to initiate a time-critical removal action.

Management and technical support provided by START on site includes monitoring the activities of the Region I ERRS contractor, maintaining site files and a dedicated logbook, conducting air monitoring, and photodocumenting site activities.



Mr. John M. Carlson
10 February 1999
Page 2

The attached *Region I, Superfund Technical Assessment And Response Team, Site Management Audit Survey* and *Field Site Safety Inspection Form* were utilized in performing the site management audit and safety inspection, and were augmented by discussions with EPA, ERRS, and START personnel, as well as with a site tour and inspection.

Neither the site management audit nor the safety inspection revealed any major deficiencies in START support. The site safety inspection did reveal that the emergency air horn alarm system specified in the site health and safety plan was not in place (radio communication for emergency warning was available). This deficiency was noted, discussed with START member Amirault and ERRS contractor personnel, and corrective actions subsequently taken.

Except for this deficiency, all documentation at the site was in order and well maintained, and safety protocols currently in place at the site should provide continued worker safety. Mr. Amirault displayed an understanding of site specific field operations, START management requirements, and proficiency in all aspects of START safety obligations.

Please contact the undersigned at (781) 229-6430 if you have any questions of need further information.

Very truly yours,

ROY F. WESTON, INC.
Region I START

Paul F. Callahan
Health & Safety Officer

Mark J. McDuffee
Team Leader

cc: Peter Connell (Contracting Officer) attachments
Stephen Amirault (START) attachments

FIELD SITE SAFETY INSPECTION FORM

1. SITE NAME American Glue + Resin TDD.# 98-12-0011
 2. LOCATION Middleton, MA INSPECTOR Paul Callahan
 DATE 2/3/99

CERTIFICATION OF PERSONNEL

1. All WESTON personnel on site are currently active on Certification List? X
 2. Site Safety Officer and Site Supervisor are qualified? X

LEGEND: X=YES
 O=NO

MEDICAL AND FIRST AID	X/O	PERSONAL PROTECTION	X/O
1. First aid kits accessible & identified?	X	1. All equipment meets ANSI/OSH/EPA criteria?	X
2. Emergency eye/safety washes available?	X	2. Level of protection (LOP) established?	X
3. Daily first aid logs up to date?	N/A	3. Site control zones clearly designated?	X
4. First aid kits inspected weekly?	X	4. All employees know their LOP scheme?	X
5. At least two first aid trained persons on site at all times when working?	X	5. OSHA respirator program in place?	X
SITE SAFETY/EMERGENCY PLANS		6. Employees FIT tested for respirators? <u>X</u> On site? <u>0</u> FIT tests current? <u>X</u>	X
1. Safety plan posted on site <i>represented by each person and given to each person PC.</i>	X	7. Defective equipment tagged out?	N/A
2. Initial site safety plan meeting held and documented before work begins?	X	8. Breathing air Grade "D" certified?	X
3. Hazardous materials information available for all hazards?	X	9. Sufficient quantities of equipment?	X
4. Designated, qualified site health and safety coordinator on site?	X	10. Safety instrumentation maintained and calibrated? <u>X</u> Maint. & Cal. logs up to date?	X
5. Employees trained in toxicology/ exposure risks?	X	COMMENTS	
6. Emergency telephone numbers posted?	X		
7. Emergency routes designated?	X		
8. Emergency plan and signal reviewed with all persons?	X		

TRAINING		DECONTAMINATION	
1. Daily safety meetings? <u> </u> Documented?	X	1. Decon system set up on site? <u>X</u> Used? <u>X</u> According to safety plan?	X
2. Question and answer time available to all site personnel?	X	2. Contamination zone and corridor clearly delineated?	X
3. All employees instructed in hazardous materials handling practices?	X	3. Appropriate waste receptacles available for all waste?	X
4. New personnel to site receive: Copy of safety plan? <u>Q</u> Site orientation? <u>X</u> Review of: LOP <u>X</u> , DECON <u>X</u> , Zones <u>X</u> site specific health and safety hazards?	X	4. Receptacles properly closed at end of day?	X
FIRE PREVENTION/PROTECTION		5. All decon liquids properly contained and disposed of?	X
1. Hot work permits required?	PC N/A	6. All wastes disposed of according to approved plan?	X
2. Smoking restricted to designated area?	X	7. All personnel received decon training?	X
3. Fire lanes established and maintained?	X	8. All reusable personal protective gear decontaminated and disinfected at least daily?	X
4. Flammable/combustible liquid dispensing transfer systems grounded & bonded?	X	WALKING AND WORKING SURFACES	
5. Proper flammable materials storage?	X	1. Accessways, stairs, ramps and ladders free of ice, mud, snow, or debris.	X
6. Fire alarm established, workers aware?	O	2. Ladders exceed maximum length?	N/A
7. Location and use of fire extinguisher known by all personnel?	X	3. Ladders used in passageways, doors, or driveways?	N/A
8. Fire extinguishers checked before each shift? <u> </u> Inspected monthly?	X	4. Broken or damaged ladders tagged out?	N/A
9. Fire extinguisher appropriate for fire hazard potential?	X	5. Metal ladders prohibited in electrical service?	N/A
10. Combustible materials segregated from ignition sources?	X	6. Safety feet on straight and extension ladders?	N/A
SLINGS AND CHAINS		7. Stairways, floor and wall openings guarded?	X
1. Slings, chains, and rigging inspected per OSHA and documented?	N/A	8. Elevated work areas guardrailed or safety chained?	N/A
2. Damaged slings, chains or rigging tagged out and reported?	N/A	9. Floatation devices worn when working on or over water?	N/A
3. Employees are instructed and keep clear of suspended loads?	N/A	10. Toe boards on overhead work surfaces?	N/A
COMMENTS		11. Mobile offices/labs have fixed stairs and handrails?	X
air horn alarm system specified in H&SP not in place - radio communications are available and in constant use - air horns will be placed in EZ and CRZ		12. Work areas kept free of debris and equipment?	X
		COMMENTS	

EXCAVATIONS, CONFINED SPACES, TUNNELS		MOTOR VEHICLE/HEAVY EQUIPMENT	
1. Excavations sloped or shored to prevent cave-ins?	N/A	1. Inspected before each use?	N/A
2. Shoring approved by Engineer?	N/A	2. Operators licensed for equipment used?	N/A
3. Guardrails or fences placed around excavations near walkways or roads.	N/A	3. Unsafe equipment tagged out and repotted?	N/A
4. Excavation locations visible at night?	N/A	4. All safety appliances/guards in place?	N/A
5. Utility check performed and documented before excavation or drilling?	N/A	5. Shut down for fueling?	N/A
6. Ladders available in trenches more than 4 feet deep and at a minimum, 25' intervals along a fence?	N/A	6. Equipment with back-up alarms or spotter used if 360 percent visibility restricted?	N/A
7. Excavated material is at least 24" from the edge of all trenches?	N/A	7. Loads are secure before transport?	N/A
8. Confined space entry permit procedure in place and communicated to all?	N/A	8. Roads and structures inspected for load capacity per vehicle weights?	N/A
9. Employee training includes CSE hazards?	N/A	9. Riders prohibited on heavy equipment?	N/A
10. Tunnels are adequately ventilated?	N/A	ELECTRICAL	
11. There is proper lighting?	N/A	1. Warning signs indicated high voltage, 250V or greater, present and location?	N/A
12. Tunnel tested for O2 __, CO __, CGI Tox?	N/A	2. Electrical equipment and wiring properly guarded?	X
13. Communication available inside to out?	N/A	3. Electrical lines, extension cords and cables guarded and properly maintained?	X
14. No flammables or combustibles in tunnel?	N/A	4. Extension cords kept out of wet?	X
15. CSE procedures used for tunnel?	N/A	5. Damaged equipment tagged out?	N/A
16. CSE procedure checklist: Safety Watch? Safety watch protected same as enterers? Safety line? __ Appropriate harness? Continuous monitoring for O2, CGI & Tox Level B or constant ventilation and monitoring?	N/A	6. Underground electrical lines located and indicated?	N/A
17. Work does not begin inside any tank vessel or other container until there is no possibility lines or electrical or equipment could be activated? Lines are discontinued or blanked out fuses are pulled?	N/A	7. Overhead electrical lines de-energized or elevated work platforms, work areas, booms or ladders erected so no contact can occur with electrical lines?	X
COMMENTS		8. A positive electrical lock-out system is used whenever work is done on or in electric equipment or electrically activated equipment?	N/A
No excavations, confined spaces, tunnels		COMMENTS	
		no heavy equipment, high voltage, underground utilities	

WELDING AND CUTTING		COMPRESSED GAS CYLINDERS/PRESSURIZED LINES	
1. Fire extinguishers present at all welding and cutting operations?	N/A	1. Breathing air cylinders charged only to prescribed pressure?	X
2. Confined spaces, tanks, pipelines tested before welding or cutting?	N/A	2. No other gas system can be mistaken for breathing air? <u>X</u> Fittings prohibit cross connection?	X
3. Hot work permitting system in use?	N/A	3. Cylinders segregated appropriately in controlled, protected but well ventilated areas?	X
4. Proper helmets and shields (including proper tint for UV protection) used?	N/A	4. Smoking prohibited in storage areas? <u>X</u> Signs so stipulating this are in place.	X
5. Properly grounded?	N/A	5. Cylinders stored upright and secure?	X
6. Fuel gas and O2 gas cylinders stored at least 20' apart? <u> </u> Stored upright and secured?	N/A	6. Cylinder caps in place when stored (not in use) or when cylinders moved?	X
7. Only trained welders permitted?	N/A	7. Fuel gas and O2 minimum 20' apart when stored?	N/A
MISCELLANEOUS		8. Pressurized air or waterlines are securely connected?	X
1. Tools and other equipment (portable) are stored away from walkways, roads or driveways where they cannot fall on or be fallen over by site personnel?	X	9. All site personnel know never to step across a pressurized line?	X
2. Overhead hazards are noted, communicated to all and labelled as needed?	X	10. Gas or other hazardous lines are labelled appropriately?	X
3. Hard hats, eye, hearing and protection areas are defined and signs in place?	X	COMMENTS	
4. Hard hat, eyes and head protection is used where appropriate?	X	<i>No welding or cutting</i> <i>Site is organized, good housekeeping,</i> <i>safety protocols being followed</i>	
5. Signs or labels (as shown on the attachment) are in place or appropriate training received? <i>pc</i>	X		
6. Copies of contracts with client and subcontractors are onsite, WESTON's role regarding site health and safety responsibilities are clear in these and in the minds of the site manager(s)?	X		
7. Subcontractors have received approved copies of their safety plan or have signified their intent to conform with WESTON's safety plan? <u>X</u> This intent has been signed by all site personnel and a subcontractor company officer?	X		
8. Site managers understand their responsibilities for subcontractors' conformance with all OSHA and other health and safety requirements?	X		
9. Site managers know what to do in the event of an OSHA inspection?	X		

REGION I
SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
SITE MANAGEMENT AUDIT SURVEY

Site: American Glue + Resin
 Location: Middleton, MA
 Site Phone: 978-777-0051
 OSC: Gilberto Izarray

Date of Audit: 2/3/99
 Site Lead: Stephen Amireault
 STARTM on site: Amireault

EVALUATION CRITERIA		COMMENTS
SCOPE OF WORK		
TDD is present in file	✓	
START is performing tasks requested	✓	
SITE DOCUMENTATION		
Site log is in proper format	✓	
Site files are organized	✓	
POLREPs are factual and regular	✓	
Personnel sign-in sheets are present	✓	
Site entry logs are maintained	✓	
Photographs are labeled and orderly	✓	
Off-site START costs are documented	✓	
COST TRACKING		
START costs are current	✓	
Project costs are current	✓	
RCMS is being used	✓	
EQUIPMENT USAGE		
START equipment is controlled	✓	

REGION I
SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
SITE MANAGEMENT AUDIT SURVEY

Page 2 of 4

Site: American Glue + Resin

Date of Audit: 2/3/99

EVALUATION CRITERIA		COMMENTS
START personnel are trained in operation and maintenance of monitoring equipment	✓	
Instrumentation calibration and maintenance is documented	✓	
SITE MANAGEMENT (START)		
Site lead is designated	✓	
Individual duties are assigned	✓	
Morning safety meetings are held	✓	
TECHNICAL INPUT		
START is monitoring removal	✓	
START assisted with scope of work	✓	
START performed spill containment	N/A	
Innovative treatment technologies were evaluated	N/A	
Disposal options were evaluated	N/A	
SAMPLING AND MONITORING		
Sampling plan is current	N/A	
Applicable SOPs are present and followed	N/A	
Sampling equipment is decontaminated properly	N/A	
Field screening is used appropriately	N/A	
Air Monitoring is conducted as per SOPs	✓	Documented on air monitoring logs
Analytical Data is present	N/A	

REGION I
SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
SITE MANAGEMENT AUDIT SURVEY

Page 3 of 4

Site: American Blue + Resin

Date of Audit: 8/3/99

EVALUATION CRITERIA		COMMENTS
Validation conducted by	N/A	
Funding source utilized	N/A	
HEALTH AND SAFETY		
Safety plan is complete to date and signed	✓	
Directions to the hospital are present	✓	
Emergency Plan exists	✓	
Decontamination systems are in place and effective	✓	
Overall safety precautions are in effect	✓	

REGION I
SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM (START)
SITE MANAGEMENT AUDIT SURVEY

Page 4 of 4

Site: American Blue + Resin

Date of Audit: 2/3/99

OVERALL PERFORMANCE COMMENTS

Describe Site Condition: one story building, drums have been staged - well organized, good housekeeping - tight quarters - not much room in building

Describe Activities Observed: crew not active during site tour - currently sampling, hazarding drums, START conducting air monitoring, documenting site activities

EPA Performance Comments: seemed pleased w/ START comments

Other Comments: Toured site w/ OSC, ERCS RM, Lead START member, Rob Hinton (EPA HRS), Kevin McMahon (ERCS HRS) - all seemed satisfied w/ conduct of operations

START Auditors: Paul Callahan Date: 2/3/99
Date: _____